

Oetken, J

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
: Master File No. 16-cv-07926
:
IN RE MYLAN N.V. SECURITIES LITIGATION :
: **STIPULATION AND**
: **ORDER**
-----x

WHEREAS, Stef Van Duppen filed a putative class action complaint in Case No. 1:16-cv-07926-JPO (the “*Van Duppen Action*”) on October 11, 2016, alleging violations of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder;

WHEREAS, Landon W. Perdue filed a putative class action complaint in Case No. 1:16-cv-08000-JPO (the “*Perdue Action*” and, together with the *Van Duppen Action*, the “Actions”) on October 13, 2016, alleging violations of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder;

WHEREAS, on November 2, 2016, the Court entered a stipulated order (the “November 2 Order”) (i) extending the time for the defendants named in the Actions (collectively, “Defendants”) to answer, move or otherwise respond to the complaints until a date to be agreed to by the parties following the Court’s appointment of lead plaintiff pursuant to the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4; and (ii) ordering that within 10 days after the Court enters an order appointing lead plaintiff and lead counsel, counsel for Defendants and lead counsel shall confer and jointly submit a proposed schedule for the filing of a consolidated amended complaint or the designation of an operative complaint, and for the time for Defendants to move to dismiss that complaint;

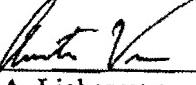
WHEREAS, on January 9, 2017, the Court entered an order (i) consolidating the Actions for pre-trial purposes as *In re Mylan N.V. Securities Litigation*, Master File No. 16-cv-07926; (ii) appointing Menorah Mivtachim Insurance Ltd., Menorah Mivtachim Pensions and Gmel Ltd., Phoenix Insurance Company Ltd., Meitav DS Provident Funds and Pension Ltd., and Dan Kleinerman as Co-Lead Plaintiffs; and (iii) appointing Pomerantz LLP and Cohen Milstein Sellers & Toll PLLC as Co-Lead Counsel; and

WHEREAS, pursuant to the November 2 Order, Co-Lead Plaintiffs and Defendants (collectively, the "Parties") have met and conferred and, for the convenience of the Parties and the Court, hereby enter into the following stipulation regarding the schedule in this matter;

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the Parties, that:

1. Co-Lead Plaintiffs shall file and serve a consolidated amended complaint (the "Consolidated Amended Complaint") on or before March 20, 2017.
2. Defendants shall move against, answer or otherwise respond to the Consolidated Amended Complaint on or before May 30, 2017.
3. If Defendants move to dismiss the Consolidated Amended Complaint, Co-Lead Plaintiffs shall file and serve any opposition to such motion on or before August 8, 2017.
4. Defendants shall file and serve their reply to any such opposition on or before September 22, 2017.

Dated: New York, New York
January 19, 2017



Jeremy A. Lieberman
Austin P. Van
J. Alexander Hood II
POMERANTZ LLP
600 Third Avenue
New York, New York 10016
Tel.: (212) 661-1100
Fax: (212) 661-8665
Email: jalieberman@pomlaw.com
avan@pomlaw.com
ahood@pomlaw.com

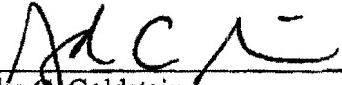
Co-Lead Counsel

Steven J. Toll
Daniel S. Sommers
Times Wang
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue, N.W.
West Tower, Suite 500
Washington, DC 2005-3964
Tel.: (202) 408-4600
Fax: (202) 408-4699
Email: stoll@cohenmilstein.com
dsommers@cohenmilstein.com
twang@cohenmilstein.com

Co-Lead Counsel

Dated: New York, New York
January 20, 2017

SO ORDERED:



Sandra C. Goldstein
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
Tel.: (212) 474-1000
Fax: (212) 474-3700
Email: sgoldstein@cravath.com

Counsel for Defendants



J. PAUL OETKEN
United States District Judge